

REMARKS / DISCUSSION OF ISSUES

Claims 11-16 are presently under consideration. Claims 17-23 are cancelled without prejudice or disclaimer of their subject matter.

Rejections under 35 U.S.C. § 112, Second Paragraph

In view of the present amendment to claim 11, the rejection for indefiniteness is believed moot. Notably, the connectivity of the wireless devices is believed to be definite within the requirements of this section of the Code.

Rejections under 35 U.S.C. § 102

Claims 11-17 and 19-23 were rejected under 35 U.S.C. § 103(a) in view of *Estevez, et al.* (US Patent Publication 2003/0017846) and *Sato, et al.* (US Patent Publication 2007/0088780 A1). While the rejected claims are cancelled rendering this rejection moot, Applicants respectfully submit that claims 11-16 are patentable over the applied art.

At the outset, Applicants rely at least on the following standard of law as it relates to obviousness. Under § 103, the scope and content of the prior art are to be determined; differences between the prior art and the claims at issue are to be ascertained; and the level of ordinary skill in the pertinent art resolved. Against this background the obviousness or nonobviousness of the subject matter is determined. Such secondary considerations as commercial success, long felt but unsolved needs, failure of others, etc., might be utilized to give light to the circumstances surrounding the origin of the subject matter sought to be patented. While the sequence of these questions might be reordered in any particular case, the factors continue to define the inquiry that controls. If a court, or patent examiner, conducts this analysis and concludes the claimed subject matter was obvious, the claim is invalid or unpatentable under § 103. *KSR Int'l Co. v. Teleflex Inc.*, 127 S. Ct. 1727; 82 U.S.P.Q.2D 1385 (2007), citing, in part *Graham v. John Deere Co.*, 383 U.S. 1, 17, 148 USPQ 459, 467 (1966).

The Court in *KSR* continued: "A factfinder should be aware, of course, of the distortion caused by hindsight bias and must be cautious of arguments reliant upon *ex post* reasoning. See *Graham*, 383 U.S., at 36, 86 S. Ct. 684, 15 L. Ed. 2d 545 (warning against a "temptation to read into the prior art the teachings of the invention in issue" and instructing courts to "guard against slipping into the use of hindsight" (quoting *Monroe Auto Equipment Co. v. Heckethorn Mfg. & Supply Co.*, 332 F.2d 406, 412 (CA6 1964)))." Moreover, if there is no suggestion to combine the teachings of the applied art, other than the use of Applicants' invention as a template for its own reconstruction, a rejection for obviousness is improper. *Ex parte Crawford, et al.* Appeal 20062429, May 30, 2007.

Claim 1 is drawn to a system for giving a presentation. The system features:

"...an internal communication network adapted for access by an internal wireless device and a visitor wireless device:

a mobile data carrier operative to load software to the visitor wireless device and to set the visitor wireless device to an ad-hoc mode;

As described in the filed application, the system allows access to an image-showing device (e.g., a projector) to both internal users and external users. The procedure for access to the network is different for an internal (e.g., employee) wireless device than for a visitor (e.g., non-employee) wireless device. A mobile data carrier (e.g., an insertable card 5) includes software required, inter alia, for configuring data in an ad-hoc mode. (Kindly refer to Figs. 1-2 and 7-8 and supporting description at pages 7-8 in the filed application.)

By contrast, the applied art to *Estevez, et al.* and *Sato, et al.* taken alone or in combination, fails to disclose at least the noted features of claim 11. Notably, *Estevez, et al.* discloses a wireless display, but fails to distinguish between an internal wireless device and a visitor wireless device. Moreover, ad hoc networks are not specifically disclosed. *Sato, et al.* does disclose a server 20 that outputs a keyword to a projector to be connected and preventing a person (an outsider) not present in the meeting room from accessing the projector for outputting image data. However, there is no disclosure of a

mobile data carrier, or of a visitor wireless device's accessing the network in an ad hoc manner. (Applicants respectfully refer the Examiner to paragraphs [0024] through [0028] of *Estevez, et al.*; and to paragraph [0081] of *Sato, et al.* for support for their assertions.)

For at least the reasons set forth above, Applicants respectfully submit that claim 11 is patentable over the applied art. Accordingly, claims 12-16, which depend from claims 11, are also patentable for at least the same reasons.

Conclusion

In view the foregoing, applicant(s) respectfully request(s) that the Examiner withdraw the objection(s) and/or rejection(s) of record, allow all the pending claims, and find the application in condition for allowance.

If any points remain in issue that may best be resolved through a personal or telephonic interview, the Examiner is respectfully requested to contact the undersigned at the telephone number listed below.

Respectfully submitted on behalf of:
Phillips Electronics North America Corp.

/William S. Francos/
by: William S. Francos (Reg. No. 38,456)
Date: November 2, 2007

Volentine & Whitt, PLLC
Two Meridian Blvd.
Wyomissing, PA 19610
(610) 375-3513 (v)
(610) 375-3277 (f)